

1 District Judge Tana Lin
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UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

10 RAVI KIRAN CHILAKAPATI,

11 Plaintiff,

12 v.

13 DIRECTOR OF UNITED STATES
CITIZENSHIP AND IMMIGRATION
SERVICES,

14 Defendant.

15

16 No. 2:23-cv-01604-TL

17 **STIPULATION OF DISMISSAL**

18 Noted for Consideration:
February 7, 2024

19 Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), the parties hereby stipulate to
20 dismiss this case on the following terms:

21 1. Defendant agrees to issue a Service Motion to Reopen (“SMTR”) within 14 days of this
Stipulation. The SMTR will allow Plaintiff to provide evidence that the giftor of \$20,000 towards
the purchase of Plaintiff’s house derived the funds from a lawful source.

22 2. Defendant agrees to issue to Plaintiff an approval, denial, request for evidence, or notice
of intent to deny within 21 days of actual receipt of Plaintiff’s response to the SMTR.

23 3. Plaintiff agrees to provide Defendant tracking information for its response to the SMTR
through counsel within 5 business days of mailing; and

24 4. If Defendant issues a request for evidence or notice of intent to deny, it further agrees to
make a final decision within 90 days on the same terms as prescribed in Paragraph 2.

1 5. The parties agree to dismiss this case without prejudice, bearing their own costs and fees.
2 6. If Plaintiff believes Defendant has breached this agreement in any way, he will notify
3 undersigned counsel and provide Defendant with at least 14 days to remedy any such breach. If
4 Defendant fails to remedy said breach within 14 days, Plaintiff may file a Motion to Reopen this
5 matter. Defendant agrees to be subject to jurisdiction and venue regarding any such filing sought
6 to enforce the terms and conditions of this Stipulated Dismissal, filed in this Court / within the
7 Western District of Washington.

8 DATED this 7th day of February, 2024.

9 Respectfully submitted,

10 TESSA M. GORMAN
11 United States Attorney

12 */s/Michelle R. Lambert*
13 MICHELLE R. LAMBERT, NYS #4666657
14 Assistant United States Attorney
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26 Seattle, WA 98104
27 Phone: 206.224.8092
 Email: kripa@karrtuttle.com

28 Attorney for Plaintiff

29 **[PROPOSED] ORDER**

30 The parties having so stipulated, the above is SO ORDERED. The case is dismissed
31 without prejudice.

32 DATED this 7th day of February 2024.

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34 _____
35 Tana Lin
36 United States District Judge